

UNITED STATES DISTRICT COURT

for the

Northern District of Iowa

United States of America

v.

WILLIAM MEYER

Case No. 19-CR-00105

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 2012 and May 2019 in the county of Linn in the
Northern District of Iowa, the defendant(s) violated:

Code Section

18 U.S.C. §§ 2251(a) and 2251(e)

Offense Description

Sexual exploitation of children

This criminal complaint is based on these facts:

See attached Affidavit.

☒ Continued on the attached sheet.



Complainant's signature

Casey Maxted, FBI Special Agent

Printed name and title

☒ Sworn to before me and signed in my presence.

☐ Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone or other reliable electronic means.

Date: Sept. 20, 2019



Judge's signature

Northern District of Iowa

Mark A. Roberts, United States Magistrate Judge

Printed name and title

STATE OF IOWA)
) ss. AFFIDAVIT
COUNTY OF LINN)

I, Casey Maxted, duly sworn upon oath, do hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation and have been since April 12, 2009. I am a graduate of the FBI Academy located in Quantico, Virginia; this academy included training in criminal law, constitutional law, search and seizure, and courtroom procedure. I am currently assigned to the FBI Omaha Division, Squad 6; I primarily investigate federal criminal violations involving mail and wire fraud, human trafficking, bombing matters, and crimes against children, including child pornography. Prior to this assignment, I held various positions within the FBI Los Angeles Division, including Senior FBI LNO to Joint Special Operations Command (JSOC) and Acting Supervisory Special Agent. I was lead case agent in investigations involving domestic and international terrorism, missing persons investigations, gang investigations, and narcotics investigations. While working at the FBI Los Angeles Division, I also was assigned to the DEA as a member of a narcotics task force in Southern California. In addition, I was assigned to the FBI Los Angeles Division Violent Crime Major Offenders squad, where I executed high-risk warrants for violent fugitives, led counternarcotic and gang investigations, and executed arrest and search warrants on subjects of child pornography and human trafficking investigations. Prior to my assignment to the FBI, I was a member of the United States Army Special Forces (Green Berets).

2. This affidavit is in support of a request for a criminal complaint for William Louis MEYER for sexual exploitation of children in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

3. This affidavit contains information necessary to support probable cause for this application. It is not intended to include every fact or matter observed by me or known by the government. The information provided is based on my personal knowledge, observations made during the course of this investigation, information conveyed to me by law enforcement officials and others who I believe to be reliable, and my review of records, documents, and other evidence obtained during this investigation.

4. In 2017, the FBI received information from the FBI Violent Crimes Against Children International Task Force (VCAC) regarding persons who were viewing livestream sex abuse of minor victims in the Philippines. VCAC provided information indicating that members of a family in Malabon, Philippines, have been tied to subjects investigated or arrested for sexually exploiting children. During this investigation, information obtained from Paypal indicated that an account belonging to MEYER made several personal money transfers to an account from January 20, 2012, through August 18, 2014, with a cumulative total of \$102,633.80. VCAC provided information indicating that accounts associated with MEYER, including the Paypal account, transferred money to persons in the Philippines, including members of the family referenced above. On December 31, 2016, and on March 2, 2017, MEYER attempted to send money to an adult female member of this family via Sharemoney; these attempted money transfers were canceled, as the

sender refused to provide documentation for the source of funds. This adult female is associated with individuals known to engage in or facilitate webcam child sex tourism. This female's daughter was born in 2002.

5. On July 3, 2019, I and Iowa Division of Criminal Investigation Special Agent Michael McVey interviewed MEYER outside his house in Cedar Rapids, Iowa. He was interviewed in SA McVey's car. MEYER lives at this address with his wife.

6. MEYER advised that he is retired, works for his church, and does charitable work. We discussed the family referenced above, and he stated that he stays with this family when he travels to the Philippines. He stated he sends money to this family for various necessities, including food, medicine, and school supplies. He stated that he knew the daughter (who was born in 2002), and he stated that she was 19 years old. He stated that he had sent several thousand dollars to the Philippines and that he had not disclosed this to his wife.

7. MEYER stated that he talks to this family on a weekly basis, sometimes several times a week, and that his most recent communications with the family were within the last week. He stated he communicated with the family on his cell phone and his desktop computer. He stated that he used Skype to communicate with this family. He denied that he shared his Skype account with anyone. He denied possessing or receiving child pornography.

8. On July 3, 2019, we seized the following items from MEYER's residence based on probable cause and exigent circumstances:

- a. A Dell Studio XPS tower computer;

- b. A Western Digital hard drive;
- c. A Dell Vostro 200 tower computer; and
- d. An LG G5 Android cell phone.

9. On the same day, July 3, 2019, I made application for a federal search warrant authorizing law enforcement officers to seize and search these items. This search warrant was signed by the Honorable Magistrate Judge Mark A. Roberts in Cedar Rapids.

10. A forensic examiner examined the four seized items. The hard drive from the Dell Studio XPS tower computer contained images on the desktop that had Windows timestamps from May 2019, including an image of a standing nude minor female. At this point, I do not know when these images were taken. The hard drive also contained a limited number of images of child pornography and child erotica in the unallocated space.

11. The Western Digital hard drive was a computer desktop hard drive and was not in a case. It contained video files showing Skype communications. These videos were in the unallocated space of the hard drive and had no timestamps. I have viewed some of these videos; many of them show unidentified minor victims, with an approximate age range of 6-14 years old, displaying their genital areas or engaging in sex acts while video of MEYER is shown in a smaller box in the corner of the screen. In some of these videos, MEYER appears to be masturbating.

12. One Skype video that includes sexually explicit depictions of a minor also captures a payment transaction from MEYER to a person in Malabon City,

Philippines, dated March 7, 2017.

13. On September 9, 2019, I made application for a federal search warrant for MEYER's residence. This search warrant was signed by the Honorable Magistrate Judge Mark A. Roberts in Cedar Rapids.

14. Today, on September 20, 2019, I and Iowa Division of Criminal Investigation Special Agent Michael McVey interviewed MEYER outside his house in Cedar Rapids, Iowa. He was interviewed in my car. We executed the search warrant at his residence.

15. MEYER stated he was planning to go to Minnesota today. He stated he planned to go to the Philippines in the future.

16. Based on the foregoing, as well as my training and experience, I respectfully submit there is probable cause to believe that, between about 2012 and May 2019, William Louis MEYER committed the offense of sexual exploitation of children in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

I declare under penalty of perjury that the foregoing facts and circumstances are true and correct to the best of my knowledge and belief.

Executed this date of September 20, 2019.



Casey Maxted
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me this date of Sept. 20, 2019.



MARK A. ROBERTS
Magistrate Judge
United States District Court
Northern District of Iowa